

*orig mine file*

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May 13, 1991

Dianne R. Nielson, PH.D  
Division Director  
Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center Suite 350  
Salt Lake City, UT 84180-1203

*KK 5/17/91* DIVISION OF  
OIL GAS & MINING  
*ce L Braxton*  
*W Hedberg*  
*DRN*

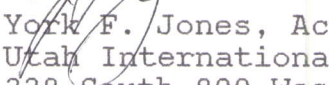
Dear Ms Nielson:

Re: Review of Mine Reclamation  
Utah International Inc.  
Cedar City Iron Mine Operation  
M/021/001, Iron County, Utah

BHP-Utah International's mine operation at Cedar City is on a "suspension or a termination" situation, and I would like to request a closure on our Reclamation Plan of 1978, Number m/021/001, permitted as of 12-26-78--amended 7-11-78 to include the Comstock Plant area of 36 acres. All reclamation is completed or has 'granted variances', with the exception of this 36 acres at the Comstock Plant site. In April of 1989 Geneva Steel acquired the Comstock railroad and plant property from our company. We complied with the 'sworn statement of transferor', dated 10-9-89 and the 'final sworn statement of transferee', dated 2-12-90, to the Division of Oil & Gas.

Geneva Steel has occupied and operated the site for almost five years now, and we do not feel we should have continued liability regarding the committed reclamation since we do not have any control over its use or misuse. Our 1978 Reclamation Plan covered all of Utah International's properties, having a wide geographical involvement of several hundred acres, all of which is still under the scope of the plan. We have acted in good faith and adhered to all requests and regulations under our control. A memo dated 8-19-86 from the State Oil & Gas, and signed by L. P. Braxton, stated "Title 40-8-21; with regards to the Comstock Site, it may be more appropriate for Ut. Int. to transfer the permit to U.S. Steel and thus the reclamation responsibility. A signed transfer agreement between U.I.I. and U.S.S. in this matter would be acceptable to the Division!"

Would you please consider a Reclamation Variances on the 36 acres or a closure of our plan? Thank you.

  
York F. Jones, Acting Manager  
Utah International Inc.  
228 South 800 West  
Cedar City, Utah 84720

cc Jim Tarazoff